

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
LUFKIN DIVISION**

JOSEPH C. RAY

Plaintiff,

v.

**TEXAS HOME HEALTH OF
AMERICA, LP**

Defendant.

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CIVIL ACTION NO. 9:12CV00022

**DEFENDANT'S DISCLOSURES PURSUANT TO
MARCH 7, 2012, DISCOVERY ORDER**

To: Plaintiff Joseph C. Ray, by and through his attorney of record, Charles R. Dendy,
Attorney at Law, 109 N. Second Street, Lufkin, Texas 75901

Pursuant to the Court's March 7, 2012, Discovery Order, Defendant Texas Home Health
of America, LP, ("Defendant") serves the following disclosures:

(a) The correct names of the parties to the lawsuit.

Joseph C. Ray, Plaintiff

Texas Home Health of America, LP

(b) The name, address and telephone number of any potential parties:

Defendant is currently unaware of any potential parties.

(c) The name, address and telephone number of persons having knowledge of relevant facts, a brief statement of each identified person's connection with the case, and a brief, fair summary of the substance of the information known by any such person.

1. Joseph C. Ray
c/o Mr. Charles R. Dendy
Attorney at Law
109 North Second Street
Lufkin, Texas 75901
(936) 639-2388

Mr. Ray is the Plaintiff. He may have knowledge relevant to the claims or defenses in this action, including hours worked by Plaintiff, Defendant's employment policies and practices, the terms and conditions of his employment, his job history, and job duties.

2. Candy (Rose) Hillin
Texas Home Health, Lufkin State Office
2802 South First Street
Lufkin, TX 75901
(936) 632-4349

Under Rule 4.02 of the Texas Disciplinary Rules of Professional Conduct, Ms. Hillin, a member of Defendant's management, should not be contacted by opposing counsel.

Ms. Hillin is Plaintiff's former supervisor. She may have knowledge relevant to the claims or defenses in this action, including hours worked by Plaintiff, Defendant's employment policies and practices, the terms and conditions of Plaintiff's employment, his job history, and job duties.

3. Lora Holt
Current address unknown
(936) 596-6154

Ms. Holt is Plaintiff's former supervisor. She may have knowledge relevant to the claims or defenses in this action, including hours worked by Plaintiff, Defendant's employment policies and practices, the terms and conditions of Plaintiff's employment, his job history, and job duties.

- (d) **Any indemnity and insuring agreements under which any person or entity carrying on an insurance business may be liable to satisfy part or all of a judgment entered in this action or to indemnify or reimburse for payments made to satisfy the judgment.**

None.

- (e) **Any settlement agreements relevant to the subject matter of this action.**

Defendant is currently unaware of any settlement agreements relevant to the subject matter of this action.

- (f) **In a suit alleging physical or mental injury and damages from the occurrence that is the subject of the case, all medical records and bills that are reasonably related to the injuries or damages asserted or, in lieu thereof, an authorization permitting the disclosure of such medical records and bills.**

Not applicable.

Dated: May 2, 2012

Respectfully submitted,

/s/ Robert S Nichols
Robert S. Nichols
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ATTORNEYS FOR DEFENDANT
TEXAS HOME HEALTH OF AMERICA, LP

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served via the Court's electronic filing system on this 2nd day of May, 2012, to the following counsel of record.

Charles R. Dendy
Attorney at Law
109 N. Second Street
Lufkin, Texas 75901

/s/ Robert S Nichols
Robert S. Nichols

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